No. 108, Original

IN THE

Supreme Court of the United States

October Term, 1986

STATE OF NEBRASKA,
Plaintiff,

v.

STATE OF WYOMING,
Defendant.

COLORADO RESPONSE TO PLATTE RIVER TRUST AND NATIONAL AUDUBON SOCIETY MOTIONS FOR LEAVE TO INTERVENE

DUANE WOODARD
Attorney General of Colorado

CHARLES B. HOWE
Chief Deputy Attorney General

RICHARD H. FORMAN
Solicitor General

WENDY C. WEISS
First Assistant Attorney General
Natural Resources Section

LOIS G. WITTE
Assistant Attorney General
Natural Resources Section
Counsel of Record

Attorneys for State of Colorado

1525 Sherman Street, 3rd Floor
Denver, Colorado 80203
Telephone: (303) 866-3611

April 3, 1987

No. 108, Original

IN THE

Supreme Court of the United States

October Term, 1986

STATE OF NEBRASKA,
Plaintiff,

v.

STATE OF WYOMING,
Defendant.

COLORADO RESPONSE TO PLATTE RIVER TRUST AND NATIONAL AUDUBON SOCIETY MOTIONS FOR LEAVE TO INTERVENE

Defendant, the State of Colorado, joins the State of Wyoming in opposing the motions for leave to intervene filed by the Platte River Whooping Crane Critical Habitat Maintenance Trust and the National Audubon Society. The State of Colorado concurs in the Wyoming Memorandum in Opposition to Platte River Trust and National Audubon Society Motions for Leave to Intervene, except that the State of Colorado does not concede that allowing intervention would require the Court to consider whether Colorado has a responsibility to supply water for migratory bird habitat in eastern Nebraska from the South Platte River, or would transform this proceeding into one involving the relationship between the migratory bird habitat in eastern Nebraska and water uses in the entire North Platte, South Platte, and Platte River basins upstream in the three states.

Respectfully submitted,

DUANE WOODARD
Attorney General of Colorado

CHARLES B. HOWE
Chief Deputy Attorney General

RICHARD H. FORMAN
Solicitor General

WENDY C. WEISS
First Assistant Attorney General
Natural Resources Section

BY: _____
LOIS G. WITTE
Assistant Attorney General
Natural Resources Section
Counsel of Record

Attorneys for State of Colorado

1525 Sherman Street, 3rd Floor
Denver, Colorado 80203
Telephone: (303) 866-5114